



Eric Gonzalez  
District Attorney

DISTRICT ATTORNEY  
KINGS COUNTY  
350 JAY STREET  
BROOKLYN, NY 11201-2908  
(718) 250-2000  
WWW.BROOKLYNDA.ORG

[INSERT NAME]  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME:** Stephen Barounis

**MOS TAX:** [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

IN JANUARY 2018, MOS BAROUNIS, SHIELD NUMBER [REDACTED]  
[REDACTED]  
[REDACTED] INCONSISTENT WITH STATEMENTS  
PROVIDED BY TWO PAROLE OFFICERS WHO WERE INSIDE DEFENDANT'S RESIDENCE WHEN THE MARIJUANA  
WAS RECOVERED. (THE PAROLE OFFICERS THEMSELVES DID NOT AGREE ON THE LOCATION OF THE  
MARIJUANA.) MOS BAROUNIS LATER INFORMED THE ASSISTANT DISTRICT ATTORNEY THAT HE HAD  
[REDACTED] THAT HE HAD NOT ENTERED THE DEFENDANT'S RESIDENCE BEYOND  
THE FRONT ENTRANCE OR SEEN DEFENDANT OR MARIJUANA IN THE DEFENDANT'S BEDROOM. MOS  
BAROUNIS CLARIFIED THAT A PAROLE OFFICER HAD BROUGHT THE RECOVERED MARIJUANA TO HIM (MOS  
BAROUNIS) AT THE FRONT DOOR OF THE RESIDENCE. IN LIGHT OF THE INCONSISTENCIES IN THE LAW  
ENFORCEMENT OFFICERS' ACCOUNTS, THE PEOPLE DISMISSED THE CASE.

**Disclosure # 2:**

NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION AGAINST THE MOS ARISING OUT OF AN INCIDENT  
ON 11/30/2016:

1. TRAFFIC VIOLATIONS BUREAU – COURT NON-APPEARANCE
- CASE STATUS: CLOSED ON 09/12/2017  
PENALTY: SCHEDULE A COMMAND DISCIPLINE

**Disclosure # 3:**

NYPD SUBSTANTIATED THE FOLLOWING ALLEGATIONS AGAINST THE MOS ARISING OUT OF AN  
INCIDENT ON 01/29/2018:

1. INVOICE DISCREPANCY - LAB – MARIJUANA
  2. REPORT INCOMPLETE/ INACCURATE - PROPERTY CLERK INVOICE
- CASE STATUS: CLOSED ON 02/08/2018  
PENALTY: VERBAL INSTRUCTIONS

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:**

**Disclosure # 4:**

CCRB No. 201509070

Report Date: 10/23/2015

Incident Date: 10/22/2015

CCRB SUBSTANTIATED ALLEGATION:

1. Abuse – Stop

NYPD Disposition and Penalty: Formalized Training

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